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Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Juan Francisco Eguizabal Valiente, Sandra
Patricia Lopez de Eguizabal, Oscar
Geovanny Eguizabal Lopez, Josue Arturo
Eguizabal Lopez, and Emanuel Isaac
Eguizabal Lopez,

Plaintiffs,

v.

Loren K. Miller, Alejandro Mayorkas, and
Ur Mendoza Jaddou,

Defendants.

Case No. 2:24-cv-02415-JCM-MDC

**Stipulation and Order to Extend Time
to Answer**

(Third Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiffs Juan Francisco Eguizabal Valiente, Sandra Patricia Lopez de Eguizabal, Oscar Geovanny Eguizabal Lopez, Josue Arturo Eguizabal Lopez, and Emanuel Isaac Eguizabal Lopez, and Federal Defendants Loren K. Miller, Alejandro Mayorkas, and Ur Mendoza Jaddou, through undersigned counsel, hereby stipulate and agree as follows:

Plaintiffs filed their Complaint for Declaratory and Injunctive Relief and for Writ of Mandamus on December 30, 2024. ECF No. 1.

Plaintiffs served Federal Defendants with a copy of the Summons and Complaint via certified mail on January 10, 2025.

1 The current deadline for Federal Defendants to respond to Plaintiffs' Complaint is
2 May 16, 2025.

3 On May 13, 2025, both counsels agreed to an additional 7-day extension for Federal
4 Defendants to respond to Plaintiffs' Complaint. The current response due date falls in the
5 same week as counsel's approved medical leave, and the additional time of 7 days is
6 needed to finalize the response.

7 Under Federal Rule of Civil Procedure 6(b), a court may, "for good cause," extend
8 a deadline if a request is made "before the original time or its extension requires." Fed. R.
9 Civ. P. 6(b)(1)(A); *see also* Local Rule IA 6-1(a). The Ninth Circuit has equated good cause
10 with the exercise of due diligence. *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604,
11 609 (9th Cir. 1992). Good cause exists here because counsel has been diligent in
12 coordinating with agency counsel, requesting the information necessary to respond to
13 Plaintiffs' allegations, and investigating such allegations. Nevertheless, due to counsel's
14 approved medical leave which falls within the same week with the current deadline to file a
15 responsive pleading, additional time is needed for counsel to finalize the response pleading.

16 Accordingly, the parties, through undersigned counsel, submit this stipulation to a
17 7-day extension from May 16, 2025, to **May 23, 2025**, for Federal Defendants to file a
18 response to the Complaint. This is the third request for an extension of time.

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1 This stipulated request is filed in good faith and not for the purposes of undue delay.

2 Respectfully submitted this 13th day of May 2025.

3 QUIROGA LAW OFFICE, PLLC

SIGAL CHATTAH
United States Attorney

4 /s/ Maria E. Quiroga
5 MARIA E. QUIROGA
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/s/ Virginia T. Tomova
VIRGINIA T. TOMOVA
Assistant United States Attorney

7 *Attorney for Plaintiffs*

Attorneys for the Federal Defendants

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12 **IT IS SO ORDERED:**

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16 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

17 **DATED:** 5/14/2025
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